Before the
Federal Communications Commission
Washington, D.C. 20554

PR Docket No. 92-289

In the Matter of

Ammendment of the Amateur Service	)	RM-7868
Rules Concerning the 222-225 Mhz	)	RM-7869
and 1240-1300 Mhz Frequency Bands	)	RM-7888

COMMENTS OF MARK S. DILL

To the Commission:

Please record that I am in favor of proposal RM-7869 which would formally designate a subband at 222.00-222.15 MHz in which repeater operation would be prohibited. The proposed subband is necessary in order to continue the promotion of experimentation which is a vital aspect of the amateur radio service. Such experimentation as weak signal reception via the troposphere or moon for example, is not compatible with repeater operation at this time. Beacon operation and/or reception also is compromised significantly in the presence of repeater transmissions.

Subbands where repeater operation is prohibited have been and are currently the rule on the HF, VHF and most UHF allocations in the amateur radio service, including the 220 MHz band prior to the re-allocation of the lower two MHz to the land mobile service. Such subbands are essential and readily justifiable in view of amateur radio's charter, in which the Commission charges the amateur radio service to promote and engage in technical investigation. Such technical investigation can only be maximized by Commission creation and regulation of the proposed subband on a national basis.

Regarding RM-7868, which would expand the frequency privileges of Novice Class operators to encompass the entire 222-225 MHz band, please record that I am in favor of this proposal. Such expansion would be beneficial to the amateur radio service since it would expose Novice Class operators to a greater variety of operational modes in a VHF environment. Familiarization with these additional modes would provide the amateur radio service with a more well rounded and experienced pool of entry level operators. Experimentation would also be enhanced. Like RM-7869, this proposal is consistent with and also a reasonable extension of Novice Enhancement.

Regarding the specific matter of RM-7888, which would allow Novice Class operators to be licensees and control operators of repeaters, please record that I am strongly against this proposal. The Novice Class test does not require of a potential licensee, enough specific knowledge about repeater theory to insure that a high standard of operation can reasonably be expected. As I monitor the content of conversations on repeaters across Texas, I am frequently concerned that the examinations for all classes of amateur radio license are deficient in the requirements they make of potential licensees relative to repeater operation, from both the user and licensee/control operator perspectives. I urge the Commission to consider the possibility of adding questions which deal specifically with repeater theory and operation, to the Novice, No-code Technician and standard Technician examinations. Furthermore, I request that the Commission ponder the possibility of requiring a supplementary examination for those licensees of any class, who desire to operate repeater stations as licensees or control operators.

Amateur repeaters operate on fixed frequencies, are frequently unattended (i.e. automatic or remote control), normally employ the use of high gain omnidirectional antennas which are usually located at heights significantly above average terrain, and utilize by far the most popular mode of VHF transmission. Presently, many repeaters are connected electronically to other repeaters in order to form communication networks which operate 24 hours a day. Improper operation of repeater stations carries with it the distinct potential of negatively impacting VHF amateur radio activities to a much greater degree than would improper operation of other types of equipment which Novice Class licensees are authorized to control, such as a single sideband or CW transmitter utilizing a directional antenna. Repeater operation by its very nature must be subject to more stringent regulation and restriction than other types of amateur activities. Allowing Novice Class licensees to be control operators and licensees of repeaters would undermine the present restriction and its associated benefits. Additionally, such action would further quicken the alarming rate of increase in "personal" repeaters, which frequently are creations that serve the licensee's ego more than they serve amateur radio.

In closing, I would like to note that the Novice Class license is and has always been an avenue for entry into amateur radio. The very name given to the license indicates that advanced skill and knowledge are not required; neither are advanced privileges and operational modes conferred. The planning, construction, installation, operation and maintenance of a repeater station, however, frequently requires the relatively advanced technical skill and knowledge which transcends that of the typical Novice Class licensee. In short, given the current requirements of the Novice Class examination, repeater operation from the standpoint of being a control operator or licensee, is not an activity in which the entry level operator should be engaged. Furthermore, if access to too many advanced privileges and operational modes is available to operators at the entry level, the incentive to upgrade to a higher class of license will be greatly diminished. Amateur radio would not be well served if this were to occur.

Therefore, in light of the preceding arguments, I respectfully request that the Commission adopt RM-7868 and RM-7869. I further request that the Commission deny approval of RM-7888 and thereby maintain the current restriction prohibiting Novice Class licensees from being licensees or control operators of repeater stations.

Respectfully submitted,

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Repeater Trustee
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